

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:
HAROLD L ROBERTSON,
DEBTOR.

CHAPTER 13
CASE NO. 16-53873-MAR
JUDGE MARK A RANDON

TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and supplements her objections to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee objects to debtor's request to excuse Plan payments in the amount of \$2,945.00 in Part I.B. of the amended Chapter 13 Plan where debtor failed to state a valid basis to do so.
2. Trustee objects to debtor's proposed Plan payments, as they are greater than debtor's best effort as indicated on Schedule J.
3. As debtor's entire budget is only \$576.00 per month excluding auto insurance and support, Trustee questions the feasibility of debtor's Chapter 13 Plan pursuant to 11 U.S.C. § 1325(a)(6).
4. Trustee notes two amended Plans were filed two minutes apart. Trustee questions if the second Plan was filed in error.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

February 22, 2017

/s/ Maria Gotsis
Krispen S. Carroll (P49817)
Margaret Conti Schmidt (P42945)
Maria Gotsis (P67107)
719 Griswold Street, Ste 1100
Detroit, MI 48226
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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

MARRS & TERRY PLLC
6553 JACKSON RD
ANN ARBOR, MI 48103-0000

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

HAROLD L ROBERTSON
1061 RUTH AVE
YPSILANTI, MI 48198-0000

February 22, 2017

_____/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com